UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK JUDGE SULLIVAN

COMPLAINT - ACTION FOR DAMAGED FOR PROPERTY RIGHTS INFRINGEMENT

CIVIL ACTION NO: 15CV-1862 RJS MALIBU MEDIA, LLC, Plaintiff Vs. JOHN DOE subscriber assigned IP address: 108.41.235.16 Defendant **DEFENDANT'S MOTION TO DISMISS** Pursuant to Federal Civil Procedure Rule 12(b)(6), Defendant moves this court to dismiss the Plaintiff's claim on the grounds that the Plaintiff has failed to state a claim. The Defendant's motion details out the obvious, severe, and fraudulent nature of the underlying merits of the complaint, testimony, and associated exhibits leaving no valid factual allegations to support the Plaintiff's claims. WHEREFORE the Defendant, John Doe 108.41.235.16 requests the court to enter an order dismissing the Plaintiff's claim with prejudice. **USDC SDNY DOCUMENT** Respectfully,

John Doe 108.41.235.16 pro se litigant

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